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7 United States of America

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9 IN THE UNITED STATES DISTRICT COURT

10 EASTERN DISTRICT OF CALIFORNIA

11 UNITED STATES OF AMERICA,

12 Plaintiff,

CASE NO. 5:24-MJ-00007-CDB

13 v.
14 STIPULATION TO CONTINUE PRELIMINARY
15 HEARING AND EXCLUDE TIME

16 CHARMANE DOZIER and
17 KETTISHA THOMPSON-DOZIER,

18 Defendants.

19 The parties stipulate as follows:

20 1. The defendants were arrested on a complaint issued in this case on February 22, 2024, in
21 the District of Maryland and made their initial appearances there the same day. The defendants' initial
22 appearance and preliminary hearing in this District was scheduled for March 7, 2024.

23 2. The government is in the process of producing initial discovery to defense counsel. The
24 initial discovery includes hundreds of thousands of pages of financial records, multiple electronic
25 devices, and recordings.

26 3. The parties now agree to continue the initial appearance and preliminary hearing in this
27 District until May 23, 2024. The parties also agree that good cause exists for the continuance because
28 the extension is required to allow defense counsel reasonable time to complete their review of the

1 discovery, prepare for any litigation, and consider a pre-indictment resolution of the case.

2 4. The parties agree that the interests of justice served by granting this continuance
3 outweigh the best interests of the public and the defendants in a speedy trial. The parties also agree that
4 the period from February 28, 2024, through May 23, 2024, should be excluded. Fed. R. Crim. P. 5.1(d);
5 18 U.S.C. § 3161(h)(7)(A) and (h)(7)(B)(iv).

6 IT IS SO STIPULATED.

7 Dated: February 28, 2024

PHILLIP A. TALBERT
United States Attorney

10 */s/ Joseph Barton*

Joseph Barton
Jeffrey Spivak
Assistant United States Attorneys

13 Dated: February 28, 2024

14 */s/ Christina Corcoran*

Christina Corcoran
Counsel for Charmane Dozier

17 Dated: February 28, 2024

18 */s/ Serita Rios*

Serita Rios
Counsel for Kettisha Thompson-Dozier

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14 IN THE UNITED STATES DISTRICT COURT
15 EASTERN DISTRICT OF CALIFORNIA

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17 UNITED STATES OF AMERICA,

18 Plaintiff,

19 v.

20 CHARMANE DOZIER and
21 KETTISHA THOMPSON-DOZIER,

22 Defendants.

23 CASE NO. 5:24-MJ-00007-CDB

24 ORDER CONTINUING PRELIMINARY
25 HEARING AND EXCLUDING TIME

26 The Court has read and considered the parties' stipulation to continue the defendants' initial
27 appearance and preliminary hearing in this District, and to exclude time. The Court finds there is good
28 cause for the continuance so as to allow defense counsel reasonable time to complete their review of the
discovery, prepare for any litigation, and consider a pre-indictment resolution of the case. The Court
also finds that the interests of justice served by granting the continuance outweigh the interests of the
public and the defendants in a speedy trial.

29 Therefore, for good cause shown:

- 30 1. The defendants' initial appearance and preliminary hearing in this District is continued
31 from March 7, 2024, until May 23, 2024, at 2:00 p.m., and the defendants shall appear at
32 that time before the Fresno duty magistrate judge; and

1 2. The period from February 28, 2024, through May 23, 2024, shall be excluded pursuant to
2 Fed. R. Crim. P. 5.1(d) and 18 U.S.C. § 3161(h)(7)(A) and (h)(7)(B)(iv).

3 IT IS SO ORDERED.

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5 Dated: 2/28/2024

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Honorable Sheila K. Oberto
United States Magistrate Judge